From:	Eric Idsvoog
To:	mdove@fec.gov
Subject:	Draft AO 2007-31 (ActBlue contributions)
Date:	12/12/2007 07:31 PM

To Secretary Dove and the FEC:

I write in response to your solicitation for public comment on Draft AO 2007-31, regarding the question of whether contributions made through ActBlue are eligible for federal matching funds.

I am dismayed at this opinion's conclusion that such contributions are not eligible for matching funds. That conclusion is based on a faulty interpretation of the law's intent regarding contributions from "political committees," and is a betrayal of the clear intent of all those who have donated to a campaign via ActBlue.

My understanding is that federal matching funds are meant to match individual contributions to a specific candidate. This is exactly what all contributions made through ActBlue are. ActBlue exercises no independent discretion as to where contributions are directed. The simplest common sense, then, indicates that it is not a "committee" in the same sense as PACs affiliated with, for example, MoveOn.org or the NRA clearly are. If the FEC is interested in respecting the law's intent based on the way ActBlue actually functions, it will treat contributions made via (and not, I emphasize, by) ActBlue no differently than contributions made through any bank or credit card processor. ActBlue is a "political committee" only in a sense so narrow as to render the term legally worthless.

My understanding is also that individual contributions made via ActBlue are reported as such, and subject to limits as such. One could not, for example, donate the limit of $2,300 to a candidate via ActBlue and then another $2,300 to the same candidate via the candidate's own website. If ActBlue contributions are limited and reported as individual contributions, how is it fair not to allow them to be matched in the same way?

While this Advisory Opinion was drafted in response to a request from the Edwards campaign, the issue is clearly neither specific to the Edwards campaign or to the Democratic party. To interpret the law as the AO suggests would be to strike a blow in favor of special interest money and against the small-dollar, individual contributions made through ActBlue and any entity of a similar nature; it would be, in short, directly contrary to the clear intent of the law regarding political committee contributions that the AO purports to interpret.

On the logic of the AO, which mistakes a means of transmission for an agent, I should sign this email with the name of the server through which it will be transmitted. In the hope that such twisted logic will not win the day, I thank you for your time and attention in my own name instead. Sincerely,

Eric Idsvoog
53 Allerton Pl Fl 3

Marblehead MA 01945